

EXHIBIT A

From: Tracey Anzaldi <tracey.anzaldi@prithvisolutions.com>
Sent: Tuesday, June 17, 2008 8:36 AM
To: 'Pamela C. Munar'; 'Alma Brandenburg'
Cc: 'madhavi@prithvisolutions.com'
Subject: RE: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Hi Pam,
Madhavi mentioned the Westin in Bellevue for the Seattle let.
For Satish Guru mentioned that he may be staying at Madhavi's apartment so you may want to check with him or Madhavi on that one.

Thanks & Regards,

Tracey Anzaldi

Finance Coordinator

Prithvi Information Solutions

412-920-0320 x131

www.prithvisolutions.com

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From: Pamela C. Munar [mailto:pamela.munar@prithvisolutions.com]
Sent: Monday, June 16, 2008 6:06 PM
To: 'Alma Brandenburg'; 'Tracey Anzaldi'
Cc: madhavi@prithvisolutions.com
Subject: RE: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Hi Alma/Tracey,

How do we go about this? Any Prithvi policies for hotel bookings?

Regards
Pamela C. Munar
Business Assistant to the CEO

Prithvi Information Solutions Ltd.

11711 SE 8th St.
Suite 305
Bellevue, WA 98005

Desk: +1-425-289-1217
Cell: +1-412-320-5738
<http://www.prithvisolutions.com/>

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-----Original Message-----

From: madhavi vuppalapati [mailto:madhavi@prithvisolutions.com]
Sent: Monday, June 16, 2008 2:36 PM
To: Pamela C. Munar; 'Alma Brandenburg'
Cc: Tracey Anzaldi
Subject: Re: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Don't book the pheonix part yet. It mgt just be seattle to pit to newark. And the seperate pit to atlanta. Will get back to u tonite. Right now book hotel in bellevue for thursday night.

M

Sent from my BlackBerry wireless handheld.

-----Original Message-----

From: "Pamela C. Munar" <pamela.munar@prithvisolutions.com>

Date: Mon, 16 Jun 2008 14:27:52
To: "'Alma Brandenburg'" <alma.brandenburg@prithvisolutions.com>
Cc: "'Tracey Anzaldi'"
<tracey.anzaldi@prithvisolutions.com>, <madhavi@prithvisolutions.com>
Subject: FW: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Hi Alma,

Please find below the travel details. Madhavi says we need to talk first before we finalize everything.

Thanks,
Pamela C. Munar
Business Assistant to the CEO

Prithvi Information Solutions Ltd.
11711 SE 8th St.
Suite 305
Bellevue, WA 98005

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-----Original Message-----

From: Goel, Dinesh [mailto:dinesh.goel@lehman.com]
Sent: Monday, June 16, 2008 2:54 AM
To: madhavi@prithvisolutions.com; Pamela C. Munar
Cc: Satish Kumar; Gupta, Paritosh
Subject: RE: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Madhavi:

Here are our plans:

Paritosh:

Mumbai-JFK - DL 17 (Delta Airlines) - Arriving 0650 hrs on June 19th.
Paritosh will make his own arrangements after the end of our last meeting on June 25th in New Jersey, since he has some personal friends / family in US.

Dinesh:

HKG - San Francisco - CX 870 (Cathay Pacific) - Arriving 1135hrs on June 19th.
San Francisco - HKG - CX 879 (Cathay Pacific) - Departing SFO on June 26th at 1335 hrs.

Satish: what will be your flight schedule?

Please let me know the rest of the itinerary once u have made the relevant bookings.

Regards,
Dinesh

-----Original Message-----

From: madhavi vuppapalapati [mailto:madhavi@prithvisolutions.com]
Sent: Monday, June 16, 2008 12:11 PM
To: Goel, Dinesh; Pamela C. Munar
Cc: Satish Kumar
Subject: Re: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

If u can directly fly to seattle that will be great. Klm and british fly here direct. Or fly to san francisco or los angeles. And we will book u guys from there to seattle. But since u guys will be flying out of new york or newark, it mgt be cheaper to book a round trip to newark or new york and we will book ur tix from nyc. Let us know by tomorrow and we will take care.

Thanks

Madhavi

Sent from my BlackBerry wireless handheld.

-----Original Message-----

From: "Goel, Dinesh" <dinesh.goel@lehman.com>

Date: Mon, 16 Jun 2008 11:33:27

To: "Madhavi Vuppapalapati" <madhavi@prithvisolutions.com>, "Pamela C. Munar"
<pamela.munar@prithvisolutions.com>

Cc: "Satish Kumar" <satish@prithvisolutions.com>

Subject: RE: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Madhavi:

What should be the port of arrival? We will book the tickets from Mumbai - US and return.

Regards,
Dinesh

From: Madhavi Vuppalapati [mailto:madhavi@prithvisolutions.com]
Sent: Saturday, June 14, 2008 3:29 PM
To: Pamela C. Munar; Goel, Dinesh
Cc: Satish Kumar
Subject: Re: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Dinesh,
Also please let us know if you can your tickets in till NY or you want us to book that part as well. Pam is making arrangements for all of your US travel...
Thanks
Madhavi

On 6/16/08 1:23 AM, "Pamela C. Munar" <pamela.munar@prithvisolutions.com> wrote:

Hi Dinesh,

Please find below the final plan for the US trip:

June 19th Thursday:

Ø afternoon - arrival
Ø evening - dinner

June 20th Friday:

Ø meeting with 16Mile Solutions
Ø meeting with T-Mobile
Ø meeting with Chandrakiran Malarapa, VP of Hi-Tech and Startups Ø meeting with Yogesh Kumar, VP of Telecom Strategic Sales, and Rahul Kakkar, Director of Strategy and Business Development

June 20th Friday evening OR June 21st Saturday morning:

Ø travel to Phoenix, AZ
Ø meeting with Amir Golshan, VP of Retail Ø meeting with VCommerce
Ø Note: we are trying to set up a meeting with McKesson

June 21st Saturday evening OR June 22nd Sunday morning:

Ø travel to Pittsburgh
Ø meet with vendors
Ø dinner with the management (Madhavi, Sri and Venu)

June 23rd Monday:

Ø meeting with Prithvi folks
Ø meeting with UPMC
Ø meeting with Vision
Ø meeting with John Mayne, Head of Sales Ø meeting with Srikanth, Head of Telecom Ø meeting with Venu Mulpuri, Head of Retail Ø meeting with Jack Ruggerio, VP of Corporate Offices

June 24th Tuesday:

Ø early morning - travel to Atlanta Ø meeting with Nokia people
Ø travel back to Pittsburgh then..
Ø evening - meet with M&A Team

June 25th Wednesday:

Ø travel to New Jersey
Ø meet people at T-Mobile
Ø meet with American Solutions
Ø evening - travel back to India

Thanks

Pamela C. Munar
Business Assistant to the CEO

Prithvi Information Solutions Ltd.
11711 SE 8th St.
Suite 305
Bellevue, WA 98005

Desk: +1-425-289-1217

Cell: +1-412-320-5738

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-----Original Message-----

From: Goel, Dinesh [mailto:dinesh.goel@lehman.com] <mailto:dinesh.goel@lehman.com>
Sent: Sunday, June 15, 2008 6:56 PM
To: madhavi@prithvisolutions.com; pamela.munar@prithvisolutions.com
Cc: satish@prithvisolutions.com
Subject: Re: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Haven't heard anything from Pamela yet..

----- Original Message -----

From: madhavi vuppalapati <madhavi@prithvisolutions.com>
To: Goel, Dinesh; pamela.munar@prithvisolutions.com <pamela.munar@prithvisolutions.com>
Cc: Satish Kumar <satish@prithvisolutions.com>; Gupta, Paritosh; Maheshwari, Shyam; Bhargava, Devesh; pamela.munar@prithvisolutions.com <pamela.munar@prithvisolutions.com>
Sent: Sun Jun 15 15:05:17 2008
Subject: Re: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Dinesh,

Pam will be sending the final plan for the trip by end of day sunday pacific US time M

Sent from my BlackBerry wireless handheld.

-----Original Message-----

From: "madhavi vuppalapati" <madhavi@prithvisolutions.com>

Date: Sat, 14 Jun 2008 08:15:04

To: "Goel, Dinesh" <dinesh.goel@lehman.com>, pamela.munar@prithvisolutions.com

Cc:"Satish Kumar" <satish@prithvisolutions.com>,"Gupta, Paritosh"
<paritosh.gupta@lehman.com>,"Maheshwari, Shyam" <smahesh@lehman.com>,"Bhargava, Devesh"
<devesh.bhargava@lehman.com>
Subject: Re: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Dinesh,
I am trying to arrange some meetings. Will call you in a bit.
Thanks
Madhavi
Sent from my BlackBerry wireless handheld.

-----Original Message-----

From: "Goel, Dinesh" <dinesh.goel@lehman.com>

Date: Sat, 14 Jun 2008 11:34:42
To:<pamela.munar@prithvisolutions.com>
Cc:<madhavi@prithvisolutions.com>, <satish@prithvisolutions.com>, "Gupta, Paritosh"
<paritosh.gupta@lehman.com>,"Maheshwari, Shyam"
<smahesh@lehman.com>,"Bhargava, Devesh" <devesh.bhargava@lehman.com>
Subject: Re: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Pamela - can u pls provide me with madhavi's mobile number. I would like to talk to her
before rescheduling any plans.

Thanks
Dinesh

----- Original Message -----

From: Pamela C. Munar <pamela.munar@prithvisolutions.com>
To: Goel, Dinesh
Cc: madhavi@prithvisolutions.com <madhavi@prithvisolutions.com>; 'Satish Kumar'
<satish@prithvisolutions.com>; Gupta, Paritosh; Maheshwari, Shyam; Bhargava, Devesh
Sent: Sat Jun 14 01:43:55 2008
Subject: RE: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Hi Dinesh,

This is to inform you that Madhavi is scheduled to attend a very important meeting
starting on the 18th in CA and she won't be available until evening of the 20th. I am
sorry but I can't do anything to change the date as this appointment had been set up a
few weeks back and Madhavi had forgotten all about it. That said, Madhavi would like to
suggest that you come on the 21st and stay back until the 26th.

Thanks for understanding.

Thanks
Pamela C. Munar
Business Assistant to the CEO

Prithvi Information Solutions Ltd.
11711 SE 8th St.
Suite 305
Bellevue, WA 98005

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----- Forwarded Message

From: "Goel, Dinesh" <dinesh.goel@lehman.com>
Date: Fri, 13 Jun 2008 11:49:57 +0530
To: <satish@prithvisolutions.com>
Cc: <madhavi@prithvisolutions.com>, "Gupta, Paritosh" <paritosh.gupta@lehman.com>, "Maheshwari, Shyam" <smahesh@lehman.com>, "Bhargava, Devesh" <devesh.bhargava@lehman.com>
Subject: FW: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

Satish:

I have re-booked the same Delta direct flight for yourself for departure on Tuesday night from Mumbai. Paritosh and myself will prefer to go a day ahead, that will also give us some additional time to familiarize with your team in US.

Please let us know the flight details for our onward journey from JFK to Pittsburgh and return and the accomodation details and local contact numbers for Madhavi and any of your other guys in US with whom we should get in touch if we need help.

Thanks a lot.
Dinesh

-----Original Message-----

From: D'Silva, Anna
Sent: Friday, June 13, 2008 10:43 AM
To: Goel, Dinesh
Subject: FW: Quote for VUPPALAPATI/SATISHMR - Dep 18th June

-----Original Message-----

From: American Express [mailto:itinerary@mytravelplans.co.in]
<mailto:itinerary@mytravelplans.co.in>
Sent: Friday, June 13, 2008 10:39 AM
To: D'Silva, Anna
Subject: Quote for VUPPALAPATI/SATISHMR

American Express is pleased to offer you multiple fare quotes and itinerary options based on your recent travel request. From the attachment below, please select the itinerary option that best suits your needs by sending an email confirmation to the travel team and indicating the booking reference of your preferred option.

The fare quote and itineraries are not guaranteed as fares and availability are subject to change prior to ticketing.

Thank you for choosing American Express Business Travel.

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----- End of Forwarded Message

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From: Tracey Anzaldi <tracey.anzaldi@prithvisolutions.com>
Sent: Friday, June 13, 2008 2:37 PM
To: 'Verity Thomas'
Subject: FW: Hyatt Regency Pittsburgh International Airport Confirmation - DINESH GOEL - 14597556

HI Verity,
The Hyatt reservations were not charged to our Amex correct? I wasn't sure if you saw the note that the fee was to pay.

Thanks & Regards,

Tracey Anzaldi

Finance Coordinator

Prithvi Information Solutions

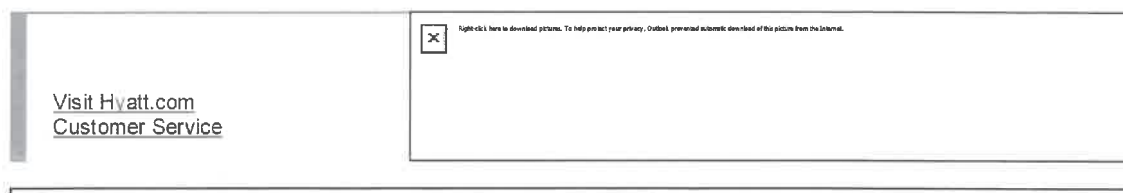
412-920-0320 x131

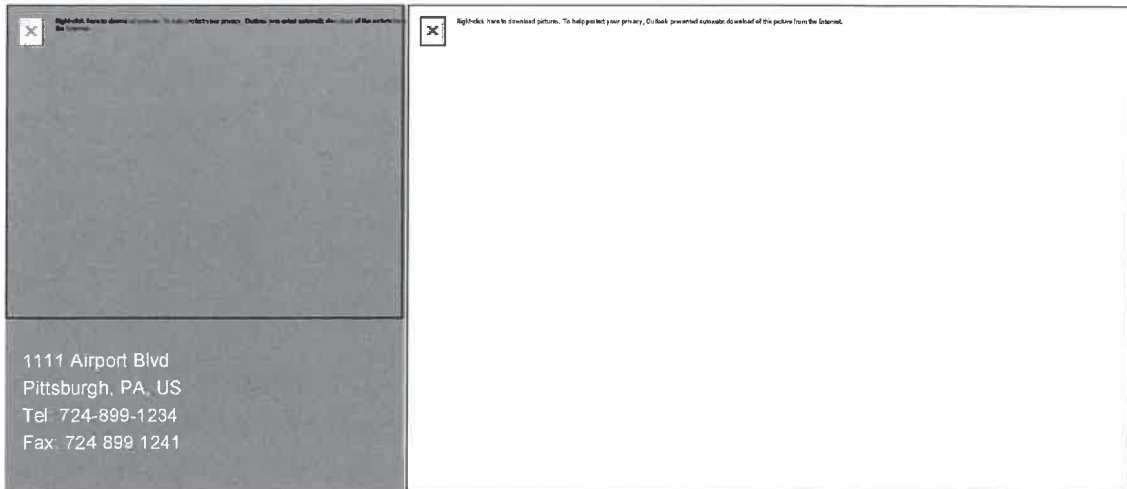
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From: Hyatt E-Concierge [mailto:Concierge@HyattE-Concierge.com]
Sent: Friday, June 13, 2008 11:01 AM
To: travel@prithvisolutions.com
Subject: Hyatt Regency Pittsburgh International Airport Confirmation - DINESH GOEL - 14597556

[Print E-Mail](#)





[Hyatt E-Concierge](#) [Visit Hotel Website](#)

Greetings from Hyatt Regency Pittsburgh International Airport,

We look forward to your visit to Hyatt Regency Pittsburgh International Airport, arriving on Tuesday, June 17, 2008 departing on Sunday, June 22, 2008.

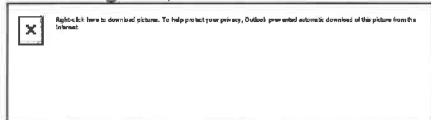
Your confirmation number is 14597556. For details about your reservation, please see the information below. To make changes to your reservation electronically, please send an e-mail to reservations@hyatt.com, or within the U.S. call 1-877-827-1356 or your local [worldwide reservation center](#).

We are excited about your upcoming visit and look forward to creating a memorable experience for you. We invite you to use [Hyatt E-Concierge](#) to make arrangements in advance for activities such as golf, tennis, spa, dining reservations, children's programs, transportation and more. By making these plans in advance you will ensure that you can take advantage of the many services and amenities that Hyatt Regency Pittsburgh International Airport has to offer!

Also, visit [yattit.com](#)*, Hyatt's new online travel community. Read tips and advice from well-traveled Hyatt Gold Passport members and Hyatt's expert local concierges, so you know where to go and what to see.

We are delighted that you have chosen to stay with us and look forward to your Tuesday, June 17, 2008 arrival.

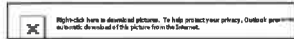
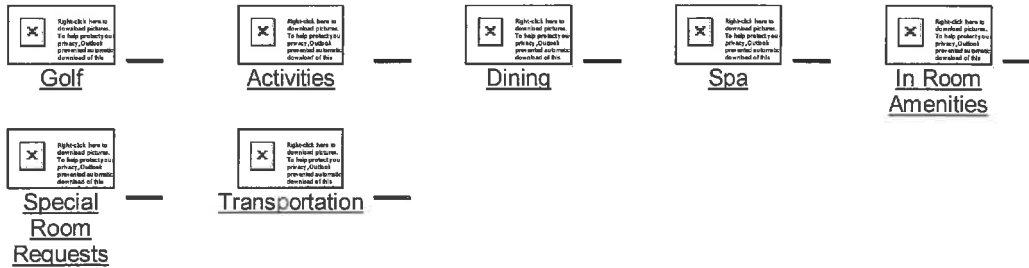
Warm regards,



Mairead Hennessy
General Manager
Hyatt Regency Pittsburgh International Airport

*yattit is available in English only.



**Confirmation Number:** 14597556**Guest Name:** DINESH GOEL**Hyatt Regency Pittsburgh International Airport**

1111 Airport Blvd
 Pittsburgh, PA 15231 US
 Hotel Phone Number: 724-899-1234
 Hotel FAX Number: 724 899 1241
 Hotel E-Mail: pittsburghairport@hyatte-concierge.com

Check In Date:

Tuesday, June 17, 2008

Expected arrival time:

Check Out Date:

Sunday, June 22, 2008

Number of Adults: 1
Number of Children: 0
Number of Rooms: 1

Hotel Check-In

Time: 15:00

Hotel Check-Out

Time: 12:00

Room(s) Booked: BUSN PLAN 1KNG**Room Description:** 1 king bed:fl 2-11:Cont breakfast:local calls**Rate Information**

Type of Rate RACK RATE

Prevailing Rate Regularly published room rates.



Changes to the dates of stay, number of guests per room or number of rooms confirmed will be subject to current pricing which may be different than previously confirmed rates.

Additional Tax & Service Charges

7.00% tax + 7.00% Occ Tax

Nightly Rate per Room**259.00 US DOLLARS** June 17,18,19**159.00 US DOLLARS** June 20,21**Guaranteed by:** AMERICAN EXPRESS GTD**Cancellation Policy:** CANCEL BY 3PM EST 24 HOURS PRIOR TO ARRIVAL**Preferences:**

RATE CHANGE DURING STAY,BUSINESS PLAN,CONFIRMED NON-SMOKING RM

Your preferences have been submitted with your reservation and are subject to hotel availability.

THERE IS A ONE NIGHTS ROOM AND TAX EARLY DEPARTURE FEE AT THIS HOTEL. THANK YOU FOR CHOOSING HYATT. WE APPRECIATE YOUR BUSINESS.

<p style="text-align: right;">Page 22</p> <p>1 Dinesh Goel</p> <p>2 minutes.</p> <p>3 (10.54 p.m.)</p> <p>4 (Break taken.)</p> <p>5 (11.00 p.m.)</p> <p>6 BY MR. MACYDA:</p> <p>7 Q. Mr. Goel, do you have what's been marked as</p> <p>8 Exhibit 10 in front of you?</p> <p>9 (Exhibit 10 marked for identification)</p> <p>10 A. Now I do.</p> <p>11 BY MR. MACYDA:</p> <p>12 Q. Okay. And these are going to go with all of</p> <p>13 my exhibits here today that have multiple pages,</p> <p>14 you're certainly free to review the entire document</p> <p>15 but I'll tell you I'm not going to ask you a question</p> <p>16 off of every single page off of the document.</p> <p>17 So with that, if you could turn to Page 5.</p> <p>18 MR. GINSBERG: Jayson, since I'm not with</p> <p>19 the witness, you need to tell me where you're</p> <p>20 looking.</p> <p>21 Q. So if you go to Page 7 of Exhibit 10, Page 7</p> <p>22 on the bottom. It's an email from you, Mr. Goel,</p> <p>23 dated Friday June 13, 2008, to Satish at</p> <p>24 Prithvi Solutions with a cc to Madhavi at</p> <p>25 Prithvi Solutions.</p>	<p style="text-align: right;">Page 23</p> <p>1 Dinesh Goel</p> <p>2 Let me know when you locate that.</p> <p>3 A. Yes, I have locate it.</p> <p>4 Q. Okay. Do you know who Satish Vuppalapati</p> <p>5 is?</p> <p>6 A. Yes, I do.</p> <p>7 Q. And how do you know Satish?</p> <p>8 A. I have met him.</p> <p>9 Q. When is the first time you met him?</p> <p>10 MR. GINSBERG: Let me make an objection.</p> <p>11 These documents are all from 2008, which is a year or</p> <p>12 more before Mr. Goel joined SSG, and are therefore</p> <p>13 outside the scope of SSG's contacts with Pittsburgh</p> <p>14 or Pennsylvania, the Western District.</p> <p>15 I'll let you ask this question, but we're</p> <p>16 going to go carefully through these. Thank you.</p> <p>17 MR. MACYDA: Again, I don't want to get in</p> <p>18 debate, but obviously these will eventually go to</p> <p>19 Mr. Goel's knowledge of the location and operations</p> <p>20 of PISL and PSI.</p> <p>21 MR. GINSBERG: The question in this case,</p> <p>22 Mr. Macyda, isn't his knowledge; the question in this</p> <p>23 case is whether they did business in Pennsylvania.</p> <p>24 And this question doesn't go to that at all, the</p> <p>25 question whether he in his role with SSG or SSG did</p>
<p style="text-align: right;">Page 24</p> <p>1 Dinesh Goel</p> <p>2 business with a company in Pennsylvania in 2010 or</p> <p>3 2011, and that is not this question.</p> <p>4 I'll let him answer this question, but we're</p> <p>5 going to go carefully here.</p> <p>6 MR. MACYDA: Maybe this won't be one for the</p> <p>7 judge.</p> <p>8 BY MR. MACYDA:</p> <p>9 Q. How do you know Satish Vuppalapati, Mr.</p> <p>10 Goel?</p> <p>11 A. He was the M.D. of PISL, and I met him in</p> <p>12 that capacity.</p> <p>13 Q. What capacity was he?</p> <p>14 A. Managing Director of Privthi Information</p> <p>15 Solutions in Hyderabad, India.</p> <p>16 Q. And what year did you meet him?</p> <p>17 A. I don't exactly recollect; but sometime in</p> <p>18 late 2006, early 2007. In India.</p> <p>19 Q. Under what circumstances did you meet him?</p> <p>20 A. My job involved meeting management of</p> <p>21 companies in Asia, and this was a similar meeting.</p> <p>22 Q. And what were you expecting to achieve by</p> <p>23 meeting with Mr. Vuppalapati?</p> <p>24 MR. GINSBERG: Objection, well beyond the</p> <p>25 scope of the notice of -- the relevant topics for</p>	<p style="text-align: right;">Page 25</p> <p>1 Dinesh Goel</p> <p>2 deposition.</p> <p>3 You can answer.</p> <p>4 A. To understand what he does and his company</p> <p>5 does.</p> <p>6 BY MR. MACYDA:</p> <p>7 Q. Do you know Madhavi Vuppalapati?</p> <p>8 A. What do you mean by "know"?</p> <p>9 Q. Have you ever heard of the name before?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. When did you first hear of the name?</p> <p>12 A. Around the same time as when I first heard</p> <p>13 about Satish.</p> <p>14 Q. Did you ever meet her before, in person?</p> <p>15 A. During what time?</p> <p>16 Q. Well, when's the first time you met her?</p> <p>17 A. I can't recollect exactly, but sometime</p> <p>18 during 2007/2008.</p> <p>19 Q. And what was the purpose of that meeting?</p> <p>20 A. She was the chairwoman of PISL in India; and</p> <p>21 purpose was same as Satish, to understand more about</p> <p>22 their company.</p> <p>23 Q. So if we go back to Exhibit 10 in the</p> <p>24 portion of the exhibits that I identified previously,</p> <p>25 you write to Satish and among other things you state</p>

<p style="text-align: right;">Page 26</p> <p>1 Dinesh Goel</p> <p>2 that:</p> <p>3 "Your visit will give us some additional</p> <p>4 time to familiarize with your team in US."</p> <p>5 Do you see that?</p> <p>6 A. Yes, I do.</p> <p>7 Q. Okay. And then the next paragraph down</p> <p>8 talks about a trip. You write, "from JFK." I assume</p> <p>9 that means the airport in New York, to Pittsburgh.</p> <p>10 Do you see that?</p> <p>11 A. Yes, I see that.</p> <p>12 Q. Okay. Now, if we flip to Page 4 of Exhibit</p> <p>13 10, you see a section in there from a</p> <p>14 pamelamunar@prithvisolutions.com writing to you.</p> <p>15 Let me know when you find that.</p> <p>16 A. Yes, I can see that.</p> <p>17 Q. And it lays out an itinerary for you to</p> <p>18 visit various spots in the United States.</p> <p>19 Do you agree with that?</p> <p>20 A. I can see that.</p> <p>21 Q. Okay. And in particular on June 21 or</p> <p>22 June 22, you were to travel to Pittsburgh.</p> <p>23 Do you see that?</p> <p>24 MR. GINSBERG: Just to be clear, you're</p> <p>25 talking about June 22, 2008, still, is that right,</p>	<p style="text-align: right;">Page 27</p> <p>1 Dinesh Goel</p> <p>2 Mr. Macyda?</p> <p>3 MR. MACYDA: Yes, yes.</p> <p>4 MR. GINSBERG: Right. I'm going to continue</p> <p>5 my objection that this is beyond the scope of the</p> <p>6 court's allowed discovery. It's several years before</p> <p>7 the transactions at issue in the litigation.</p> <p>8 MR. MACYDA: We have your objection.</p> <p>9 MR. GINSBERG: You can answer, Mr. Goel.</p> <p>10 A. Yes, I can see that, Mr. Macyda.</p> <p>11 BY MR. MACYDA:</p> <p>12 Q. Okay. Did you end up going to Pittsburgh as</p> <p>13 set forth in this email?</p> <p>14 A. I'm not sure about the exact date, but I do</p> <p>15 recollect that I went to Pittsburgh.</p> <p>16 Q. Okay. I would like to mark as No. 11 an</p> <p>17 Tracey Anzaldi email dated at the top, Friday</p> <p>18 June 13, 2008, 2:37 p.m.</p> <p>19 MR. GINSBERG: Give me a second so I can try</p> <p>20 to find the document you're talking about.</p> <p>21 MR. MACYDA: Let me know when you're ready.</p> <p>22 MR. GINSBERG: Is there an SSG number or</p> <p>23 something, there are a lot of documents?</p> <p>24 MR. MACYDA: No, this is one of our</p> <p>25 documents.</p>
<p style="text-align: right;">Page 28</p> <p>1 Dinesh Goel</p> <p>2 MR. GINSBERG: All right. I have a bunch of</p> <p>3 documents that say things like 40-3, 40-4. Can you</p> <p>4 tell me which one it is?</p> <p>5 MR. MACYDA: It's not any of those, Mike.</p> <p>6 MR. GINSBERG: So these are documents that</p> <p>7 you didn't send us?</p> <p>8 MR. MACYDA: These should be presented and</p> <p>9 printed off right there with the court reporter.</p> <p>10 MR. GINSBERG: Right. But I got an email</p> <p>11 from Kevin Osowski providing documents that were</p> <p>12 going to be used for today's deposition. I'm just</p> <p>13 trying to figure out which one of those documents</p> <p>14 they are, so that I can participate in the</p> <p>15 deposition.</p> <p>16 MR. MACYDA: Sure. So it should be, if you</p> <p>17 printed it off, as I was explaining before -- why</p> <p>18 don't we go off the record for a minute?</p> <p>19 MR. GINSBERG: I want to stay on the record</p> <p>20 for this, I want to understand --</p> <p>21 MR. MACYDA: Okay.</p> <p>22 MR. GINSBERG: So I have one called --</p> <p>23 MR. MACYDA: It should --</p> <p>24 (Speaking simultaneously.)</p> <p>25 MR. GINSBERG: 8-06-13, Hyatt Regency; is</p>	<p style="text-align: right;">Page 29</p> <p>1 Dinesh Goel</p> <p>2 that the one you're talking about?</p> <p>3 MR. MACYDA: The top of that email that</p> <p>4 you're looking at, Mike, should have Tracy Anzaldi,</p> <p>5 Friday 13, 2008.</p> <p>6 MR. GINSBERG: Okay. I have it now, thank</p> <p>7 you.</p> <p>8 MR. MACYDA: Sure.</p> <p>9 (Exhibit 11 marked for identification)</p> <p>10 BY MR. MACYDA:</p> <p>11 Q. So, Mr. Goel, on the second page of Exhibit</p> <p>12 11, according to this document, you had a reservation</p> <p>13 at the Pittsburgh International Airport arriving on</p> <p>14 June 17, 2008, and departing on June 22, 2008.</p> <p>15 Do you see that?</p> <p>16 A. Yes, I have the exhibit in front of me.</p> <p>17 Q. Okay. And you see those dates?</p> <p>18 A. I do.</p> <p>19 Q. Okay. Does that refresh your recollection</p> <p>20 of when you were in Pittsburgh?</p> <p>21 A. I'm not sure, because this is not an email</p> <p>22 to me, and I'm not sure I was there for these dates.</p> <p>23 Q. Were you there maybe not on those specific</p> <p>24 dates but were you in Pittsburgh sometime in June,</p> <p>25 2008?</p>

<p style="text-align: right;">Page 30</p> <p>1 Dinesh Goel</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And what did you do when you were in</p> <p>4 Pittsburgh?</p> <p>5 A. I met up with some people who introduced me</p> <p>6 to them -- who introduced themselves to me as members</p> <p>7 of PISL.</p> <p>8 Q. And who were these people who introduced</p> <p>9 themselves to you?</p> <p>10 A. I don't recollect names, if that's what you</p> <p>11 were asking.</p> <p>12 Q. Okay. Do you know if one of those people</p> <p>13 was Madhavi Vuppalapati?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And how did she introduce herself to</p> <p>16 you?</p> <p>17 A. She was the Chairwoman of PISL.</p> <p>18 Q. Okay. And what did you discuss with Ms.</p> <p>19 Vuppalapati during your visit?</p> <p>20 A. It's a long time back. I don't recollect</p> <p>21 any specific discussion.</p> <p>22 Q. Was Satish Vuppalapati somebody who</p> <p>23 introduced himself in Pittsburgh?</p> <p>24 A. I don't recollect him being there.</p> <p>25 Q. Do you know -- sorry, finish your answer.</p>	<p style="text-align: right;">Page 31</p> <p>1 Dinesh Goel</p> <p>2 A. I said I don't recollect him being there.</p> <p>3 Q. How about Guru Pandyar.</p> <p>4 And it's G-U-R-U-P-A-N-D-Y-A-R.</p> <p>5 Guru Pandyar?</p> <p>6 A. I don't recollect him either.</p> <p>7 Q. Did you ever hear of that name before?</p> <p>8 A. Yes.</p> <p>9 Q. And when did you first hear of</p> <p>10 Guru Pandyar's name?</p> <p>11 A. Not sure, but sometime around 2010 probably.</p> <p>12 Q. And in what circumstance did you come to</p> <p>13 know of Mr. Pandyar in 2010?</p> <p>14 A. About one of my visits to Hyderabad, India,</p> <p>15 meeting with Satish, he introduced or he mentioned</p> <p>16 about some Mr. Guru Pandyar in PISL Finance Team in</p> <p>17 the US.</p> <p>18 Q. Have you ever spoken to Mr. Pandyar in</p> <p>19 person?</p> <p>20 A. No.</p> <p>21 Q. Ever communicate with him via email?</p> <p>22 A. I have sent emails or received emails from</p> <p>23 an email address that would have that name.</p> <p>24 Q. Okay. Did you ever have a telephone call</p> <p>25 with Mr. Pandyar?</p>
<p style="text-align: right;">Page 32</p> <p>1 Dinesh Goel</p> <p>2 A. I have been put on a call where the person</p> <p>3 on the other side has introduced himself as a person</p> <p>4 with that name.</p> <p>5 Q. And when did that telephone call occur?</p> <p>6 A. Same time, when I mentioned what I just</p> <p>7 mentioned during my visit Hyderabad in India when I</p> <p>8 was in a meeting with Mr. Satish Vuppalapati.</p> <p>9 Q. Do you know Mr. Pandyar's role at PISL?</p> <p>10 A. Not sure. As I mentioned just now, I was</p> <p>11 introduced that a person with this name is part of</p> <p>12 the Finance Team in PISL's US offices.</p> <p>13 Q. Did you know Mr. Pandyar's role at PSI?</p> <p>14 A. I'm not aware of any such thing.</p> <p>15 Q. Are you aware of Satish Vuppalapati's role</p> <p>16 at PSI?</p> <p>17 A. No.</p> <p>18 MR. MACYDA: Mark as Exhibit 12 an email</p> <p>19 from Dinesh Goel dated Tuesday April 7, 2009, to</p> <p>20 Madhavi@prithvisolutions.com.</p> <p>21 MR. GINSBERG: What was the date of that</p> <p>22 again?</p> <p>23 MR. MACYDA: April 7, 2009.</p> <p>24 MR. GINSBERG: Thank you.</p> <p>25 (Exhibit 12 marked for identification)</p>	<p style="text-align: right;">Page 33</p> <p>1 Dinesh Goel</p> <p>2 A. (Perusing document.)</p> <p>3 BY MR. MACYDA:</p> <p>4 Q. Do you have that email, Mr. Goel?</p> <p>5 A. Yes, I do.</p> <p>6 Q. Just remember I can't see anything below the</p> <p>7 middle of my chest, so just let me know when it's in</p> <p>8 front of you and I'll start talking.</p> <p>9 A. Sure.</p> <p>10 Q. Do you know what you are referencing there</p> <p>11 regarding the remittance?</p> <p>12 A. This is too far back, I can't recollect what</p> <p>13 this is about.</p> <p>14 No.</p> <p>15 Q. What project was SSG doing, if any, for PISL</p> <p>16 or PSI in 2009?</p> <p>17 A. I wasn't employed by SSG at that point in</p> <p>18 time. My employment with SSG started in August 2009,</p> <p>19 so I wouldn't know.</p> <p>20 Q. Well, you're sending this from your personal</p> <p>21 email address, correct?</p> <p>22 A. That is correct.</p> <p>23 Q. And the subject line is "pls call back.."</p> <p>24 Do you see that?</p> <p>25 A. Yes, I do.</p>